

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

COUVILLION GROUP, LLC

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VERSUS

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CIVIL ACTION NO. 4:22-cv-00908

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**WHITE MARLIN OPERATING
COMPANY LLC**

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JOINT MOTION TO CONTINUE PRE-TRIAL DEADLINES

NOW INTO COURT, through undersigned counsel, come Plaintiff, Couvillion Group, LLC (“Couvillion”), and Defendants, White Marlin Operating Company, LLC (“White Marlin”), Talco Petroleum, LLC (“Talco”), and Agua Tranquillo Midstream LLC (“Agua”) (collectively, the “Parties”), who file this Joint Motion requesting the Court continue, without date, the pre-trial deadlines set forth in its August 16, 2024 Third Amended Scheduling Order (Rec. Doc. 71).

Good cause exists for the Court to grant this continuance. The Parties have agreed to attend mediation with Magistrate Judge Edison on January 16, 2025 in an attempt to fully resolve this matter without proceeding to trial. However, pursuant to the Court’s Third Amended Scheduling Order, the Parties are about to confront multiple pre-trial deadlines, including for pretrial motions and motions in limine. Further, the Court’s docket call is currently scheduled to occur on January

10, 2025, prior to the date the Parties are scheduled to attend mediation. Accordingly, the Parties have agreed to jointly submit the instant Motion.

In addition to preserving the Parties' ability to file pre-trial motions, granting the instant Joint Motion would also serve judicial economy, as the parties may fully resolve this matter at mediation and without the need for trial. In the event the Parties are unable to reach a compromise following the January 16, 2025 mediation, the Parties will file a notice with the Court informing them of the same and requesting that new scheduling order deadlines be instituted.

WHEREFORE, Plaintiff, Couvillion Group, LLC, and Defendants, White Marlin Operating Company, LLC, Agua Tranquillo Midstream LLC, and Talco Petroleum, LLC request the Court continue, without date, the deadlines in the August 16, 2024 Third Amended Scheduling Order (Rec. Doc. 71) and executed the proposed Order.

Respectfully submitted,

FRILOT L.L.C.

/s/ Daniel E. Schwank

PATRICK J. MCSHANE T.A. (#19055)

Pro hac vice

DANICA BENBOW DENNY (#27376)

Pro hac vice

KATHLEEN P. RICE (#31291)

Pro hac vice

PATRICK J. SCHEPENS (#32240)

Pro hac vice

DANIEL E. SCHWANK (#39333)

Pro hac vice

1100 Poydras Street, Suite 3700

New Orleans, LA 70163-3600

Telephone: (504) 599-8000

Facsimile: (504) 599-8100

E-mail: pmcshane@frilot.com

ddenny@frilot.com

krice@frilot.com

pschepens@frilot.com

dschwank@frilot.com

Counsel for Plaintiff, Couvillion Group, LLC

AND

Frank A. Piccolo

State Bar #24031227

Federal ID #30197

Kenneth H. Tribuch

State Bar # 24042539

Federal ID #579059

CHAFFE MCCALL, L.L.P.

801 Travis St., Ste. 1910

Houston, TX 77002

Telephone: (713) 546-9800

Facsimile: (713) 546-9806

Email: frank.piccolo@chaffe.com

kenneth.tribuch@chaffe.com

Counsel for Plaintiff, Couvillion Group, LLC

AND

JORDAN, LYNCH & CANCEINNE PLLC

/s/ Joseph Golinkin

Michael Cancienne
State Bar No. 24055256
Joseph W. Golinkin II
State Bar No. 24087596
Federal Bar No. 2515657
1980 Post Oak Blvd., Suite 2300
Houston, Texas 77056
Telephone: (713) 955-4025
mcancienne@ilcfirm.com
jgolinkin@ilcfirm.com
Counsel for Defendants, White Marlin
Operating Company, LLC, Agua Tranquillo
Midstream LLC, Talco Petroleum, LLC,
Torrent Oil, LLC, and Nigel Solida

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that the parties have conferred regarding the substance of the relief requested, and the parties have decided to jointly request the relief as stated in this Motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of December, 2024, the foregoing was filed electronically with the Clerk of Court by using the CM/ECF system. Notice of this filing will be sent to all parties who participate in electronic filing by operation of the Court's electronic filing system.

/s/ Daniel E. Schwank